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February 17, 2023

**BY ECF**

Hon. Colleen McMahon, United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *In Re: New York City Policing During Summer 2020 Demonstrations*,  
20-cv-8924 (CM)(GWG) –  
This filing is related to *Hernandez*, 21-cv-7406 and *Minett*, 21-cv-8161

Your Honor:

MEMO ENDORSED

I am co-counsel for the Plaintiffs in *Hernandez, et al. v. City of New York, et al.*, and *Minett v. City of New York, et al.*, which have been consolidated with the *In Re: New York City Policing During Summer 2020 Demonstrations*, 20-cv-8924 (CM)(GWG) docket. I write to ask the Court to extend the February 22, 2023 deadline by which the parties must file any application for attorney's fees, costs, and expenses in either matter by 30 more days, until March 24, 2023. Defendants consent. The parties have previously asked the Court to extend these deadlines several times, and the Court has granted those applications.

By way of background, the *Hernandez* and *Minett* Plaintiffs accepted Rule 68 offers some time ago. The parties negotiated as to Plaintiff's claims for attorney's fees, costs, and expenses and reached an agreement in principle on January 12, 2023. Defendants promised to provide drafts of the standard settlement paperwork. On February 8, 2023, Defendants provided draft settlement papers. To Plaintiffs' surprise, the papers were materially different in several ways than those the parties have used in the past. On February 16, Plaintiffs sent proposed revisions to Defendants along with a request to meet and confer. On February 17, defense counsel represented that Defendants would review Plaintiffs' proposed revisions and get back to us next week, with a view toward also having a meet and confer next week if necessary.

Therefore, with Defendants' consent, Plaintiffs ask that the Court extend the February 22, 2023 deadline by which the *Hernandez* and *Minett* Plaintiffs must file any fee application(s), if necessary, until March 24, 2023. As always, we thank the Court for its continued time and attention.

Respectfully submitted,  
/S/  
Gideon Orion Oliver

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